

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

**CERTIFICATION OF
VICTORIA DAVIS
LOCKARD, ESQ.**

VICTORIA DAVIS LOCKARD, ESQ., being of full age, certifies as follows:

1. I am a Shareholder at Greenberg Traurig, LLP, attorneys for Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis Pharma, Inc., and Actavis LLC. I make this Certification based on personal knowledge and in support of Defendants' Opposition to Plaintiffs' *Daubert* Motion to Preclude Opinions of Defense Expert Timothy Anderson, M.S., M.B.A.

2. Attached hereto as Exhibit A is a true and accurate copy of the Expert Report of Timothy Anderson, M.S., M.B.A., dated January 12, 2022, with Exhibits A-B, served in MDL 2875. This document has been filed under seal because it contains information that has been designated as "PROTECTED INFORMATION" as defined in the applicable Amended Confidentiality and Protective Order [[ECF No. 1661](#)].

3. Attached hereto as Exhibit B is a true and accurate copy of the transcript of the deposition of Laura M. Plunkett, Ph.D., in MDL 2875, dated February 10, 2023.

Dated: April 11, 2023

Respectfully submitted,

/s/ Victoria Davis Lockard

Victoria Davis Lockard
GREENBERG TRAURIG, LLP
Terminus 200
3333 Piedmont Road, N.E.,
Suite 2500
Atlanta, Georgia 30305
Tel.: (678) 553-2103
Fax: (678) 553-2104
LockardV@gtlaw.com

*Attorneys for Teva Pharmaceuticals
USA, Inc., Teva Pharmaceutical
Industries Ltd., Actavis Pharma, Inc.,
and Actavis LLC*

CERTIFICATE OF SERVICE

I hereby certify that on April 11, 2023, a copy of the foregoing document was served on all counsel of record via CM/ECF.

By: /s/ Steven M. Harkins
Steven M. Harkins